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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESSE AREVALO,
aka "Kay," and
FRANCISCO NAVARRO-DELGADO,

Defendants.

Case No.: 3:21-CR-0012-LRH-WGC

SUPERSEDING CRIMINAL INDICTMENT

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(vi),
and 841(b)(1)(C) – Conspiracy to Distribute
Controlled Substances (Count One);

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) –
Possession with Intent to Distribute a
Controlled Substance (Counts Two, Three,
and Four);

21 U.S.C. §§ 856(a)(1) – Maintaining a Drug
Involved Premises (Count Five);

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi) –
Possession with Intent to Distribute a
Controlled Substance (Count Six);

21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(ii) –
Possession with Intent to Distribute a
Controlled Substance (Count Seven).

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Distribute Controlled Substances
(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(vi), 841(b)(1)(C))

1. From a time unknown but no earlier than November 24, 2019, and continuing to and including on or about March 25, 2021, in the State and Federal District of Nevada,

JESSE AREVALO,
aka "Kay," and
FRANCISCO NAVARRO-DELGADO

defendants herein, and others known and unknown to the Grand Jury, knowingly combined, conspired, confederated, and agreed with each other to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, cocaine, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) 841(b)(1)(B)(vi) and 841(b)(1)(C).

COUNT TWO

Possession with Intent to Distribute a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

2. From a time unknown but no earlier than November 24, 2019, and continuing to and including on or about March 25, 2021, in the State and Federal District of Nevada,

JESSE AREVALO,
aka "Kay,"

defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

Possession with Intent to Distribute a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

1 3. From a time unknown but no earlier than November 24, 2019, and continuing to
2 and including on or about March 25, 2021, in the State and Federal District of Nevada,

3
4 JESSE AREVALO,
 aka "Kay,"

5 defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and
6 substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in
7 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

8 COUNT FOUR

 Possession with Intent to Distribute a Controlled Substance
 (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

9
10 4. From a time unknown but no earlier than May 20, 2020, and continuing to and
11 including on or about March 1, 2021, in the State and Federal District of Nevada,

12
13 JESSE AREVALO,
 aka "Kay,"

14 defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and
15 substance containing a detectable amount of heroin, a Schedule I controlled substance, all in
16 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

17 COUNT FIVE

 Maintaining a Drug Involved Premises
 (21 U.S.C. §§ 856(a)(1))

18
19 5. From a time unknown but no earlier than November 24, 2019, and continuing to
20 and including on or about March 1, 2021, in the State and Federal District of Nevada,

21 JESSE AREVALO,
 aka "Kay," and
22 FRANCISCO NAVARRO-DELGADO,

23 defendants herein, knowingly and intentionally maintained a place for the purpose of
24 distributing a controlled substance, all in violation of Title 21, United States Code, Section

1 856(a)(1).

2 COUNT SIX

3 Possession with Intent to Distribute a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi))

4 2. From a time unknown but no earlier than February 27, 2021, and continuing to
5 and including on or about April 6, 2021, in the State and Federal District of Nevada,

6
7 JESSE AREVALO,
aka "Kay,"

8 defendant herein, knowingly and intentionally possessed with intent to distribute 400 grams or
9 more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-
10 phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, all in
11 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

12 COUNT SEVEN

13 Possession with Intent to Distribute a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(ii))

14 2. From a time unknown but no earlier than February 27, 2021, and continuing to
15 and including on or about April 6, 2021, in the State and Federal District of Nevada,

16
17 JESSE AREVALO,
aka "Kay,"

18 defendant herein, knowingly and intentionally possessed with intent to distribute 500 grams or
19 more of a mixture and substance containing a detectable amount of cocaine, a Schedule II
20 controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and
21 841(b)(1)(B)(ii).

22 FORFEITURE ALLEGATION ONE

23 Conspiracy to Distribute Controlled Substances,
24 Possession with Intent to Distribute a Controlled Substance, and
Maintaining a Drug Involved Premises

1 1. The allegations of Counts One through Seven of this Superseding Criminal
2 Indictment are hereby realleged and incorporated herein by reference for the purpose of
3 alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and 21 U.S.C. §
4 853(a)(2).

5 2. Upon conviction of any of the felony offenses charged in Counts One through Seven
6 of this Superseding Criminal Indictment,

7 JESSE AREVALO,
8 aka "Kay," and
9 FRANCISCO NAVARRO-DELGADO,

10 defendants herein, shall forfeit to the United States of America, any firearm or
11 ammunition involved in or used in any violation of any other criminal law of the United States,
12 21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1):

13 defendants herein, shall forfeit to the United States of America, any property used, or
14 intended to be used, in any manner or part, to commit, or to facilitate the commission of 21
15 U.S.C. §§ 841(a)(1), 846, and 856(a)(1), 859(a):

- 16 1. an iphone with IMSI number 311480600101912;
- 17 2. a Mac-10 firearm with snake emblem and unknown serial number;
- 18 3. a Mac-10 extended magazine;
- 19 4. rounds loaded in the Mac-10 extended magazine;
- 20 5. a Glock 19 9mm caliber pistol with serial number YSZ609;
- 21 6. a 9mm extended magazine;
- 22 7. rounds loaded in the 9mm extended magazine; and
- 23 8. any and all compatible ammunition.

24 All pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and 21 U.S.C. §§
841(a)(1), 846, and 856(a)(1).

FORFEITURE ALLEGATION TWO
Conspiracy to Distribute Controlled Substances,
Possession with Intent to Distribute a Controlled Substance, and
Maintaining a Drug Involved Premises

1. The allegations of Counts One through Seven of this Superseding Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Seven of this Superseding Criminal Indictment,

JESSE AREVALO,
aka "Kay," and
FRANCISCO NAVARRO-DELGADO,

defendants herein, shall forfeit to the United States of America, any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of property described in 21 U.S.C. § 881(a)(1) and 881(a)(2), in violation of 21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1), and any proceeds traceable to such property:

1. a Mac-10 firearm with snake emblem and unknown serial number;
2. a Mac-10 extended magazine;
3. a Glock 19 9mm caliber pistol with serial number YSZ609; and
4. a 9mm extended magazine.

All pursuant to 21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1) and 21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

FORFEITURE ALLEGATION THREE
Conspiracy to Distribute Controlled Substances,
Possession with Intent to Distribute a Controlled Substance, and
Maintaining a Drug Involved Premises

1 1. The allegations of Counts One through Seven of this Superseding Criminal
2 Indictment are hereby realleged and incorporated herein by reference for the purpose of
3 alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. §
4 2461(c).

5 2. Upon conviction of any of the felony offenses charged in Counts One through Seven
6 of this Superseding Criminal Indictment,

7 JESSE AREVALO,
8 aka "Kay," and
9 FRANCISCO NAVARRO-DELGADO,

10 defendants herein, shall forfeit to the United States of America, any firearm or
11 ammunition intended to be used in any offense punishable under the Controlled Substances Act
12 21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1):

- 13 1. a Mac-10 firearm with snake emblem and unknown serial number;
- 14 2. a Mac-10 extended magazine;
- 15 3. rounds loaded in the Mac-10 extended magazine;
- 16 4. a Glock 19 9mm caliber pistol with serial number YSZ609;
- 17 5. a 9mm extended magazine;
- 18 6. rounds loaded in the 9mm extended magazine; and
- 19 7. any and all compatible ammunition.

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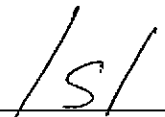
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1 All pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c) and 21
2 U.S.C. §§ 841(a)(1), 846, and 856(a)(1).

3 **DATED:** this 15 day of April, 2021.

4 **A TRUE BILL:**

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FOREPERSON OF THE GRAND JURY

7 CHRISTOPHER CHIOU
8 Acting United States Attorney

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10 ANDOLYN JOHNSON
11 Assistant United States Attorney
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